



**(C) Status of Briefing on Unresolved Motions:**

There are two unresolved motions. First, on March 23, 2022, the parties jointly moved to stay this case. (ECF 158)

Second, in September 2020, the City moved to compel production of documents from the Federal Bureau of Investigation. (ECF 119) That motion is fully briefed. Due to the September 2020 stay, Judge Harjani dismissed the City's motion without prejudice with leave to reinstate and refile within 14 days of the stay being lifted. (ECF 136) The City respectfully requests that Judge Harjani grant the City an additional seven days to reinstate its motion to compel if the parties' pending joint motion to stay is denied.

Before the September 2020 stay, the City intended to file a motion to compel enforcement with its subpoena to Frank Gatson. In addition, subject to an additional meet and confer between the parties, Mr. Smollett intended to file a motion to compel the production of documents from the personal and City-issued cell phones for officers with personal knowledge and involvement with the Smollett investigation.

**(D) Settlement Discussions:**

At this time, there have been no settlement discussions.

Dated: March 23, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on March 23, 2022, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of Illinois using the Court's CM/ECF system, which will automatically send notification of this filing to all counsel of record.

/s/ Stephen J. Kane